

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC, ATLANTIC  
RECORDING CORPORATION, CAPITOL  
RECORDS, LLC, ELEKTRA ENTERTAINMENT  
GROUP INC., LAFACE RECORDS LLC, SONY  
MUSIC ENTERTAINMENT, UMG RECORDINGS,  
INC., WARNER BROS. RECORDS INC.,  
WARNER MUSIC GROUP CORP., and  
ZOMBA RECORDING LLC,

*Plaintiffs,*

v.

VITA TKACH and DOES 1-10, D/B/A  
GROOVESHARK.IO and GROOVESHARK.PW,

*Defendants.*

CIVIL ACTION NO. 15-CV-03701

**DECLARATION OF  
LINDSAY W. BOWEN IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR LEAVE TO  
CONDUCT EXPEDITED  
DISCOVERY**

I, Lindsay W. Bowen, declare as follows:

1. I am an attorney with the law firm of Jenner & Block LLP, and I represent the Plaintiffs in this action. I submit this declaration in support of Plaintiffs' Motion for Leave to Conduct Expedited Discovery. The statements made in this declaration are based on my personal knowledge or upon information provided to me by personnel working under my supervision that I believe to be correct. True and correct copies of all of the documents referred to in this declaration are appended hereto as indicated. If called to testify as a witness, I would testify as follows:

2. Attached hereto as Exhibit A is a true and correct copy of the court's order in *Digital Sin, Inc. v. Does 1-27*, No. 12 Civ. 3873 (JMF), 6 (S.D.N.Y. Jun. 6, 2012) (Dkt. No. 6).

3. Annexed hereto as Exhibit B are printouts from the Dynadot website, <https://www.dynadot.com/domain/tlds.html> (last accessed Jun. 9, 2015), listing the prices it charges for registering domain names with various top-level domain (“TLD”) extensions, including the “.vc” TLD extension.

4. Annexed hereto as Exhibit C are printouts from Namecheap’s website, <https://www.namecheap.com/domains/registration.aspx> (last accessed Jun. 9, 2015), listing the prices it charges for registering domain names, including prices for the “.pw” and “.io” TLD extensions.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of June, 2015, at New York, New York.

A handwritten signature in black ink, appearing to read 'Lindsay W. Bowen', with a large, stylized initial 'L' and 'W'.

Lindsay W. Bowen